

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re: AHMAD MUSA JEBRIL and
MUSA ABDALLAH JEBRIL,
_____./

Case No. 05-70840
Related to Criminal Case No. 03-80810
Honorable Gerald E. Rosen

SUBHIEH JEBRIL,

Petitioner,

vs.

UNITED STATES OF AMERICA,

Respondent.
_____./

MOTION TO DISMISS 5745 GREENVIEW AND 12000 SANFORD
FROM FORFEITURE

NOW COMES the United States, by and through the undersigned counsel, and moves the Court for an order dismissing the real property known as 5745 Greenview and 12000 Sanford from the ancillary forfeiture proceedings in this case for the reasons stated in the accompanying brief.

Respectfully submitted,

STEPHEN J. MURPHY
United States Attorney

s/Julie A. Beck (P53291)
Assistant United States Attorney
211 West Fort Street, Suite 2001
Detroit, MI 48226
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Dated: February 20, 2008

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In re: AHMAD MUSA JEBRIL and
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BRIEF IN SUPPORT OF MOTION TO DISMISS
5745 GREENVIEW AND 12000 SANFORD FROM FORFEITURE

The United States Marshal Service (“USMS”) serves as the property manager for the Department of Justice. When managing assets in a forfeiture matter, the USMS maintains, inspects, secures and otherwise controls the assets to preserve equity. In the instant case, the USMS property manager has indicated that the current status of 5745 Greenview and 12000 Sanford, two of the real properties forfeited by defendants in this case, are uninhabitable. Additionally, the USMS has been paying the costs for maintaining the properties for cold weather as well as for weeds and lawn care since 2005. Due to the poor market conditions in Southeast Michigan, the duration of the pendency of these proceedings, and the costs of maintaining marginal properties, the government requests that these properties be dismissed from the ancillary forfeiture action.

While these two properties have been forfeited by defendants in the related criminal case,

they are part of this ancillary proceeding due to third party claims filed by Subieh Jebril, defendant Musa Jebril's wife.¹

Further, given that neither defendant has satisfied the money judgment in the criminal case, spending additional funds to rehabilitate a property in such a state of disrepair would simply not be cost effective.

When the court enters a final order of forfeiture in this case, following the ancillary proceeding's conclusion, the government will present an order that omits 5745 Greenview and 12000 Sanford Detroit, Michigan, from that order so that the record is clear.

Respectfully submitted,

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United States Attorney

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¹Subieh Jebril's motion for summary judgment remains pending (*docket #18*), which also includes a motion by the government for the addition of two properties as substitute assets for all of the other real properties that have been dismissed as well as the \$200,000 money judgment yet to be satisfied by defendants.

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2008, I electronically filed United States' Motion to Dismiss 5745 Greenview and 12000 Sanford Detroit, Michigan, from Forfeiture with the Clerk of the Court using the ECF system which will send notification to all ECF participants of this filing.

s/Julie A. Beck, (P53291)
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